

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO

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LANCE J. HARRIS,	:	
	:	
	:	CIVIL NO. 3:20-cv-02054
<i>Plaintiff,</i>	:	
	:	(The Honorable Jeffrey J. Helmick)
v.	:	
	:	
CITIZENS BANK, et al.	:	
	:	
	:	
<i>Defendants.</i>	:	
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**MOTION OF DEFENDANT THE VANGUARD GROUP, INC. TO DISMISS
PLAINTIFF'S AMENDED COMPLAINT FOR LACK OF PERSONAL JURISDICTION
AND FOR FAILURE TO STATE A CLAIM UPON WHICH RELIEF CAN BE
GRANTED**

Defendant The Vanguard Group, Inc. ("Vanguard") hereby moves pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6) as follows:

(1) For an Order, pursuant to Fed. R. Civ. P. 12(b)(2) dismissing the Amended Complaint against Vanguard for lack of personal jurisdiction; or, in the alternative,

(2) For an Order, pursuant to Fed. R. Civ. P. 12(b)(6) dismissing the Amended Complaint against Vanguard for failure to state a claim upon which relief can be granted.

The grounds for these motions are more fully set forth in the accompanying Memorandum of Law, which is incorporated herein by reference.

Dated: November 30, 2020

Respectfully submitted,

s/ Brian P. Downey

Brian P. Downey, Esq.

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*Attorneys for Defendant The Vanguard
Group, Inc.*

CERTIFICATE OF SERVICE

I, Brian P. Downey, hereby certify that on November 30, 2020, a true and correct copy of the foregoing document was filed with the clerk of the Court via the CM/ECF system, which will send a notice of electronic filing to all parties of record, and that a true and correct copy was delivered to the following:

Via U.S. Mail
Lance J. Harris
31 Dickens Dr.
Toledo, Ohio
43607-2354

*s/ Brian P. Downey*_____